## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MICHAEL MELOHN,

Petitioner,

-against -

SY STERN, RABBI MAYER ZAKS, SIMA WEINTRAUB, AKIVA FEINSOD, ELI KUNSTLINGER, YAAKOV BEYMAN, DAVID TEILER, ROBERT KUNSTLINGER, EZRA BEYMAN, ALFONS MELOHN, and JOHN DOES 1-20,

20 Civ. 05536 (PMH)

NOTICE OF MOTION FOR RULE 11 SANCTIONS

Respondents.

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and all prior pleadings and proceedings herein Respondents Sy Stern ("Stern") and Alfons Melohn ("Melohn") will move this Court, before the Honorable Philip M. Halpern, at the United States District Courthouse, 300 Quarropas St, White Plains, New York 10601, on a date and time to be set by the Court, for an Order pursuant to Federal Rule of Civil Procedure 11(c) for sanctions in connection with Petitioner Michael Melohn's Amended Petition for Pre-Action Discovery in the form of reasonable expenses and attorneys' fees, and for such other and further relief as the Court deems just and proper.

[Signature on following page]

New York, New York August 28, 2020

## NIXON PEABODY LLP

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